



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 31, 2023

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J.  
January 31, 2023

**Re:           *United States v. Shane et al., 23 Cr. 52 (RA)***

Dear Judge Abrams:

The Government respectfully requests that the time between today and the arraignment scheduled for February 9, 2023 be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The defendants were indicted on January 30, 2023, *see* ECF No. 9, and the Court has scheduled the arraignment and initial conference for February 9, 2023. While it is the Government's position that the Speedy Trial clock does not begin to run until the date the defendants are arraigned, out of an abundance of caution, the Government seeks the proposed exclusion between today and the date of arraignment. The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendants in a speedy trial, as the proposed exclusion will allow the parties an opportunity to evaluate and discuss the possibility of pretrial resolutions of this case. Defense counsel for both defendants have informed the Government that they consent to this request.

Respectfully submitted,

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